

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA, *et al.*,

*Plaintiffs,*

v.

Civil No. 21-11558

AMERICAN AIRLINES GROUP INC. and  
JETBLUE AIRWAYS CORPORATION,

*Defendants.*

**PLAINTIFF STATES' SECOND CONSENT MOTION TO EXTEND TIME  
TO MOVE FOR ATTORNEYS' FEES**

Pursuant to Fed. R. Civ. P. 6(b)(1) and 54(d), Plaintiffs the District of Columbia, the states of Arizona, California, and Florida, and the Commonwealths of Massachusetts, Pennsylvania, and Virginia (collectively Plaintiff States), move this Court for a second extension of time for Plaintiff States to file a motion for attorneys' fees and costs, to October 17, 2023, or if either American Airlines Group Inc. or JetBlue Airways Corporation file a notice of appeal, to twenty-one (21) days following final resolution of the appeal.<sup>1</sup>

Pursuant to D. Mass. R. 7.1(a), the counsel for the Plaintiff States conferred with counsel for Defendants who consent to this motion. Plaintiff States' memorandum of points and authorities in support of this request and proposed order are attached.

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<sup>1</sup> Plaintiff United States of America does not intend to seek attorneys' fees but reserves the right to seek costs pursuant to Fed. R. Civ. P. 54(d)(1).

Dated: August 18, 2023

Respectfully submitted,

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**Certificate of Service**

I certify that on August 18, 2023, I caused a true and correct copy of the Plaintiff States' Motion to Extend Time to File a Motion for Attorneys' Fees to be served upon the parties of record through the Court's ECF system.

/s/ Colin G. Fraser  
Colin G. Fraser